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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**GOOGLE LLC'S SUPPLEMENT TO
ADMINISTRATIVE MOTION
UPDATING THE COURT ON ITS
PRESERVATION IMPLEMENTATION
EFFORTS AND SEEKING RELIEF
FROM THE JULY 30 DEADLINE
IMPOSED BY THE JULY 15, 2022
PRESERVATION ORDER (DKT. 630)**

Judge: Hon. Susan van Keulen

1 In response to the Court’s Order following July 28, 2022 Status Conference in *Calhoun v.*
2 *Google* (Case No. 4:20-cv-05146-YGR, Dkt. 789), Google hereby provides anticipated dates of
3 completion for items identified in its administrative motion as “in progress” or for which it has
4 requested additional time.

5 The engineering and resources required to implement aspects of the Court’s preservation
6 order (Dkt. 630) are unprecedented for Google. The Order requires numerous subject matter experts
7 to re-engineer Google systems and processes, and in some cases to create new systems and
8 processes. As these experts have worked diligently towards meeting the Court’s deadline, new
9 challenges have arisen on an almost daily basis, requiring more meetings, creative thinking, and
10 consultation with counsel to ensure the solutions ultimately arrived at satisfy the Court’s objective.

11 The problem is not merely one of manpower or server space—though those are issues as
12 well. Implementing certain aspects of the Court’s Order requires unique skills, experience, and
13 knowledge of particular data sources that are in limited supply, even at a company the size of
14 Google. Indeed, to date, 17 Google subject matter experts have been working to design, scope, and
15 implement the pipelines necessary to meet the order (Dkt. 630). In addition to resources, Google
16 needs time.

17 Google acknowledges the Court’s admonition that it “will not grant open-ended extensions
18 or any extension in excess of 30 days.” (4:20-cv-05146-YGR, Dkt. 789 at 2. And Google will
19 continue to work expeditiously to complete all remaining tasks as quickly as possible. But based on
20 the complexity of the tasks and progress to date, completion of all tasks in 30 days simply is not
21 possible.

22 The current status of the preservation projects in progress are set forth below. Upon the
23 Court’s request, Google is willing to provide more detailed explanations as to each task or answer
24 specific questions of the Court.

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Data Source	Responsible Team	Anticipated Date of Completion
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

DATED: July 29, 2022

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¹ See Dkt. 587 at 7; Dkt. 587-1, Index ## 2-42, 52-56, 59, 60.

² See Dkt. 587-1, Index # 47, 48, 49.

³ See Dkt. 587-1, Index ## 43, 45.

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